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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20054

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of 73.202(b)
Table of Allotments
FM Broadcast Stations
(Wallace, ID and Bigfork, MT)

MM Docket No. 98-159

To: Nancy Joyner
Allocations Branch

COMMENTS IN OPPOSITION TO NOTICE OF PROPOSED RULEMAKING

Pursuant to 47 CFR 1.420, Bee Broadcasting, Inc. ("BBI") ^{1/} respectfully submits these Comments in opposition to the referenced Rule Making proceeding, which proposes to amend the FM Table of Allotments by reallocating channel 264C from Wallace, Idaho to Bigfork, Montana and to modify the permit of unbuilt station KSIL (FM) accordingly. See Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870 (1989), recon. granted in part, 5 FCC Rcd 7094 (1990).

DISCUSSION

Alpine Broadcasting, Ltd. is the permittee of unbuilt station KSIL (FM), Wallace, Idaho. See BPH-960916MD. It has filed a Petition to reallocate channel 264C from Wallace, Idaho to Bigfork, Montana, nearly 100 miles away. Without even addressing the question properly raised in the NPRM -- whether Bigfork is an

^{1/} BBI is the licensee of, inter alia, stations KDBR (FM) and KKBZ (FM), Kalispell, Montana, within the area sought to be served by the proposed reallocation of the Idaho FM station.

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appropriate "community" for FM allotment purposes, ^{2/} respectfully submits that the public would be better served by (i) a re-allocation of channel 264C to Kellogg, Idaho, rather than to Bigfork, Montana, ^{3/} or (ii) by no reallocation at all.

First, the attached engineering report confirms that channel 264C could be reallocated from Wallace, ID to Kellogg, ID, consistent with the FCC's rules. See Appendix B.

Second, whether or not channel 264C is reallocated to Kellogg, Idaho or simply remains at Wallace, Idaho, ^{4/} Petitioner's proposed reallocation of this Station to Montana is not in the public interest because it would eliminate new FM service to underserved areas of Idaho. For example, reallocation of channel 264C to Kellogg -- or leaving the allocation at Wallace -- will provide a first aural service to approximately 1,637 persons. See Appendix B. The provision of new FM service to "white areas" is the FCC's highest allocations priority. See Revision of FM Assignment Priorities, supra, 90 FCC 2d at 90 note 3. Moreover, keeping the allotment at Wallace or making a reallocation to Kellogg also would provide a second full-time aural service to

^{2/} The unincorporated area of Flathead County known as "Bigfork" has no municipal government, no police force, no mayor, no chamber of commerce, and -- most significantly -- no identifiable boundaries. See Appendix A.

^{3/} Alternatively, the proposed move of this station from Wallace, Idaho, some 100 miles into Montana should merely be denied, thereby preserving new FM service to underserved areas of Idaho. See Appendix B.

^{4/} Kellogg is in Shoshone County, Idaho, the county seat of which is Wallace, ID. Kellogg is approximately 10 miles from Wallace.


2,176 persons. See Appendix B. By contrast, the proposed real-
lotment to Bigfork, Montana would provide NO first full-time
aural service and a second aural service to only 10 persons. See
Appendix B. Indeed, the reallocation to Kellogg, or maintaining
the new FM service at Wallace, would result in new service to
over 11,000 persons who are now underserved (four aural services
or less), while granting Petitioner's proposal to reallocate the
unbuilt station to Bigfork, Montana would result in new service
to only 2,341 persons who are underserved. See Appendix B.

Third, assuming that a reallocation were to be made, the
historic town of Kellogg, ID -- about ten (10) miles from Wallace
-- is more deserving of a "first local aural service" than is
Bigfork, MT. Kellogg's population is more than twice that of
Bigfork (2,591 vs. 1,100). Both Kellogg and Wallace (pop. 1,010)
are incorporated cities with numerous civic groups, governmental
units and chambers of commerce. See Appendix C. Bigfork is
merely a seasonal recreational area. See Appendix A.

In sum, the reallocation of channel 264C to Bigfork would
unlawfully defeat one of the FCC's cardinal allocation priorities
-- the provision of new service to "white" areas. Reallocation
of the permitted facility to Kellogg, or leaving the allotment at
Wallace, would result in a preferential arrangement of FM allot-
ments. See Revision of FM Assignment Policies and Procedures,
supra, 90 FCC 2d at 92; Benton, Arkansas et al., 3 FCC Rcd 4840
(1988).

In view of the foregoing, the proposed reallocation of channel 264C from Idaho to Bigfork, Montana should be DENIED.

Respectfully submitted,

A handwritten signature in cursive script, reading "Robert Thompson".

Robert Lewis Thompson
TAYLOR THIEMANN & AITKEN, L.C.
908 King Street, Suite 300
Alexandria, VA 22314
(703) 836-9400

Counsel for BBI

October 26, 1998

cc: Ted Kramer, Esq. (Counsel for Petitioner)

SWORN STATEMENT

BENNY BEE, SR., being duly sworn does state:

1. My name is Benny Bee, Sr., and I am the principal owner of radio stations in Flathead County, Montana, in which I also reside full-time. I am aware of an FCC proceeding (Docket 98-159) in which the Permittee of a Wallace, Idaho FM station is attempting to move its unbuilt facility to "Bigfork, MT," an unincorporated area within Flathead County, Montana.

2. In a study to be presented to the FCC along with this Statement, my engineers have determined that the reallocation of channel 264C from Idaho to Montana would deprive the public of new FM service to underserved areas -- including new FM service to areas and populations without any full-time aural service ("white areas"). Bigfork and all of Flathead County, Montana are already well served by numerous AM and FM stations.

3. In addition, the FCC should understand that the area described by Petitioner as "Bigfork" does not have identifiable boundaries. It is not incorporated, has no mayor, no city government, no police force and no chamber of commerce. As stated to us by the Land Services Division of the Flathead Regional Development Office, there is no hard evidence regarding the population of "Bigfork" because there are no boundaries; not even the school system serving the Bigfork area has clear boundaries that identify "Bigfork." Executed this 23rd day of October 1998.


Benny Bee, Sr.

**ENGINEERING EXHIBITS
IN SUPPORT OF
COMMENTS REGARDING
NOTICE OF
PROPOSED RULE MAKING**

October 23, 1998

Bee Broadcasting, Inc.
FM Channel 264C □ 100.7 Megahertz
Bigfork, Montana
Wallace, Idaho
Kellogg, Idaho
MM Docket No. 98-159



LAWRENCE L. MORTON ASSOCIATES
2867 BELDEN DRIVE
HOLLYWOOD HILLS, CALIFORNIA 90068-1901
(323) 467-5010 / FAX (323) 467-5848

EXHIBIT E-1 ENGINEERING STATEMENT

The information and data contained within these engineering exhibits were prepared on behalf of Bee Broadcasting, Inc. ("Bee"), in support of comments to *Notice of Proposed Rule Making*, MM Docket No. 98-159, RM-9290, released September 4, 1998. By its comments Bee counterproposes the reallocation of Channel 264C from Wallace to Kellogg, Idaho or, in the alternative, argues that no reallocation from Wallace should be made.

I. COUNTERPROPOSAL AT KELLOGG, IDAHO

Kellogg is located in Shoshone County, less than 10 miles from the county seat of Wallace, and has a 1990 U.S. Census population of 2,591 persons. A site restriction is necessary for the Channel 264C allotment at Kellogg, and the following geographic coordinates meet the requisite minimum mileage separation requirements of § 73.207:

North Latitude: 47 degrees, 27 minutes, 36 seconds
West Longitude: 115 degrees, 54 minutes, 04 seconds

The counterproposal is mutually exclusive with the present authorization for station KSIL(FM) at Wallace, FCC File No. BPH-960916MD.

II. SECTION 307(b) STUDY

A study was conducted to determine the number of AM and FM stations that provide full-time aural broadcast service to the areas contained within the 60 dBμ service contours of Class C facilities at Bigfork and Kellogg. Exhibit E-2 is a map showing the 60 dBμ F(50,50) service contours of two Class C stations each operating with an effective radiated power of 100 kW and a height above average terrain of 600 meters at the proposed allotment reference sites for Bigfork and Kellogg.

Pursuant to established Commission policy, full-time AM reception service is defined by the station's nighttime interference-free contour for non-Class A stations, and by the 0.5 mV/m groundwave contour for Class A stations. Nighttime interference studies were performed for all full-time AM facilities within the vicinity of the area under study to determine those AM stations that provide nighttime interference-free service within any portion of the contours from the Bigfork and Kellogg facilities.

Also studied were the 60 dBμ contours of all FM stations in the area to determine those that provide service to portions of the areas within the Bigfork and Kellogg contours. For non-Class C FM stations operating at less than maximum facilities, technical parameters were based on maximum facilities for the class of station under study. In the case of Class C stations, either the actual operating parameters or a minimum 300-meter height above average terrain and 100-kW effective radiated power was assumed, whichever is greater. Exhibits E-9 and E-10 are tabulations of the stations that provide full-time aural broadcast reception within the areas encompassed by the Kellogg and Bigfork facilities, respectively.

Exhibits E-3 and E-4 are "spaghetti" maps depicting the Kellogg and Bigfork contours and the contours of all AM and FM stations that provide full-time aural service within the allotment service areas. Exhibits E-5A through E-5F are a series of maps showing the service area of the proposed Channel 264C allotment at Kellogg, and the service contours of the existing full-time aural services within the Kellogg contour. Blue shading is used to represent the areas that receive a specific number of full-time aural broadcast services corresponding to the number indicated in the title block of the map. Exhibit E-7 tabulates these data and indicates the land areas and populations within the identified regions. Exhibits E-6A through E-6F depict the same information for the Channel 264C allotment at Bigfork, and exhibit E-8 tabulates the results.

The results of this study indicate that the reallocation of Channel 264C to Kellogg, rather than Bigfork, is preferable under the Commission's allotment priorities. [See Revision of FM Assignment Policies and Procedures 90 FCC 2d 88 (1982).] In fact, *the reallocation of Channel 264C from Wallace to Kellogg will provide a first aural service to 1,637 persons and a second aural service to 2,176 persons.* By comparison, the reallocation of Channel 264C to Bigfork would serve no white area population and would provide service to a mere 10 persons in the gray area.

III. METHODS

For each FM station presented in these exhibits, terrain elevation data from three to sixteen kilometers on radials spaced at one-degree azimuthal intervals, starting with True North, were extracted from the computerized thirty-second point elevation database version of *Elevation Data for North America*, available from the Department of Commerce, National Geophysical Data Center, National Oceanic and Atmospheric Administration. A total of 161 points along each radial were linearly interpolated according to § 73.312(d). The height above average terrain along each of the 360 radials was computed by averaging the elevations between three and sixteen kilometers below the antenna radiation center in accordance with § 73.313(d)(3).

The locations of the 60 dB μ F(50,50) service contours were calculated according to the computer methods outlined in F.C.C. publication PB-249144, *Field Strength Calculations for TV And FM Broadcasting*. These computer methods use digitized data taken directly from the graph of § 73.333 Figure 1. Intermediate values are obtained using bivariate interpolation techniques for surface fitting.

Technical data for AM broadcast stations were obtained from the latest version of the FCC AM Engineering Database. Soil conductivities used in the determination of distances to the nighttime interference-free contours were derived from the computerized FCC M-3 soil conductivity database. Conductivity data were extracted for every one degree of azimuth.

For stations employing directional antenna systems, the Standard Radiation using the theoretical operating parameters contained within the AM Engineering Database was computed and used for inverse field strength. In the case of nondirectional stations, the effective field strengths at one kilometer were employed.

In accordance with § 73.183(e), the "equivalent-distance" (Kirke) method was used to determine the distances to the nighttime interference-free contours where more than one

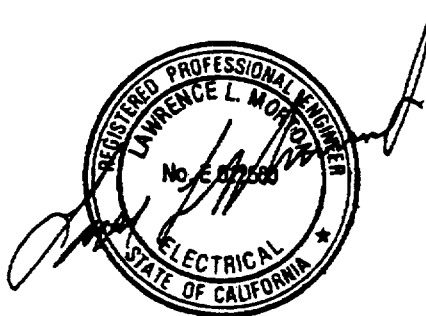
conductivity zone exists over the path length. Distances to contours along intermediate azimuths were obtained mathematically by third order piecewise polynomial approximations.

IV. CONCLUSIONS

In conclusion, the following salient facts come to light from the aforementioned Section 307(b) analysis.

- The reallocation of Channel 264C to Kellogg will result in a first full-time aural service to 1,637 persons and a second full-time aural service to 2,176 persons. The reallocation of Channel 264C to Bigfork would provide no first full-time aural service and a second aural service to only 10 persons.
- The reallocation of Channel 264C to Kellogg would provide the community with its first local aural broadcast service.
- No other commercial Class C FM channel is available for allotment at Kellogg as an alternative to Channel 264C.
- Reallocation of Channel 264C to Kellogg will result in a third service to 1,132 persons, a fourth service to 4,948 persons, and a fifth service to 1,813 persons. Reallocation of Channel 264C to Bigfork would result in a third service to 320 persons, a fourth service to 287 persons, and a fifth service to 1,724 persons.
- The 60 dB μ service contour from Kellogg would encompass a total population of 108,697 persons, while the same contour from Bigfork would serve 83,961 persons.
- Reallocation of Channel 264C to Kellogg will result in new service to 11,706 persons that are now under-served by four aural services or less, which is equal to 10.8% of the total population within the service area at Kellogg. Reallocation of Channel 264C to Bigfork will result in new service to 2,341 persons that are now under-served, or 2.8% of the total population within the service area at Bigfork.

Lawrence L. Morton, P.E.
Consulting Engineer to Bee Broadcasting, Inc.
October 23, 1998



AFFIDAVIT

State of California)
) ss:
County of Los Angeles)

Lawrence L. Morton, being first duly sworn upon oath, deposes and says:

- That he is a qualified engineer,
- That he is a Registered Professional Engineer in the State of California,
- That he is a member of the Association of Federal Communications Consulting Engineers,
- That his qualifications are a matter of record with the Federal Communications Commission,
- That he has prepared many broadcast applications and engineering exhibits that have been filed with and granted by the Federal Communications Commission,
- That he has carried out such engineering work and that the results thereof are attached hereto and form part of this affidavit, and
- That the foregoing statement and the report regarding the aforementioned engineering work are true and correct of his own knowledge.

Date: October 23, 1998



Lawrence L. Morton, P.E.

On October 23, 1998, before me, Linda Lu, a Notary Public, in and for the State of California, personally appeared Lawrence L. Morton known to me to be the person whose name is subscribed to the within instrument, and acknowledged to me that he executed the same.

My Commission expires 11/30/99



Notary Public

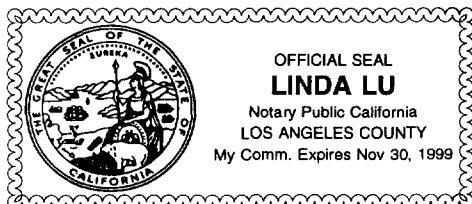
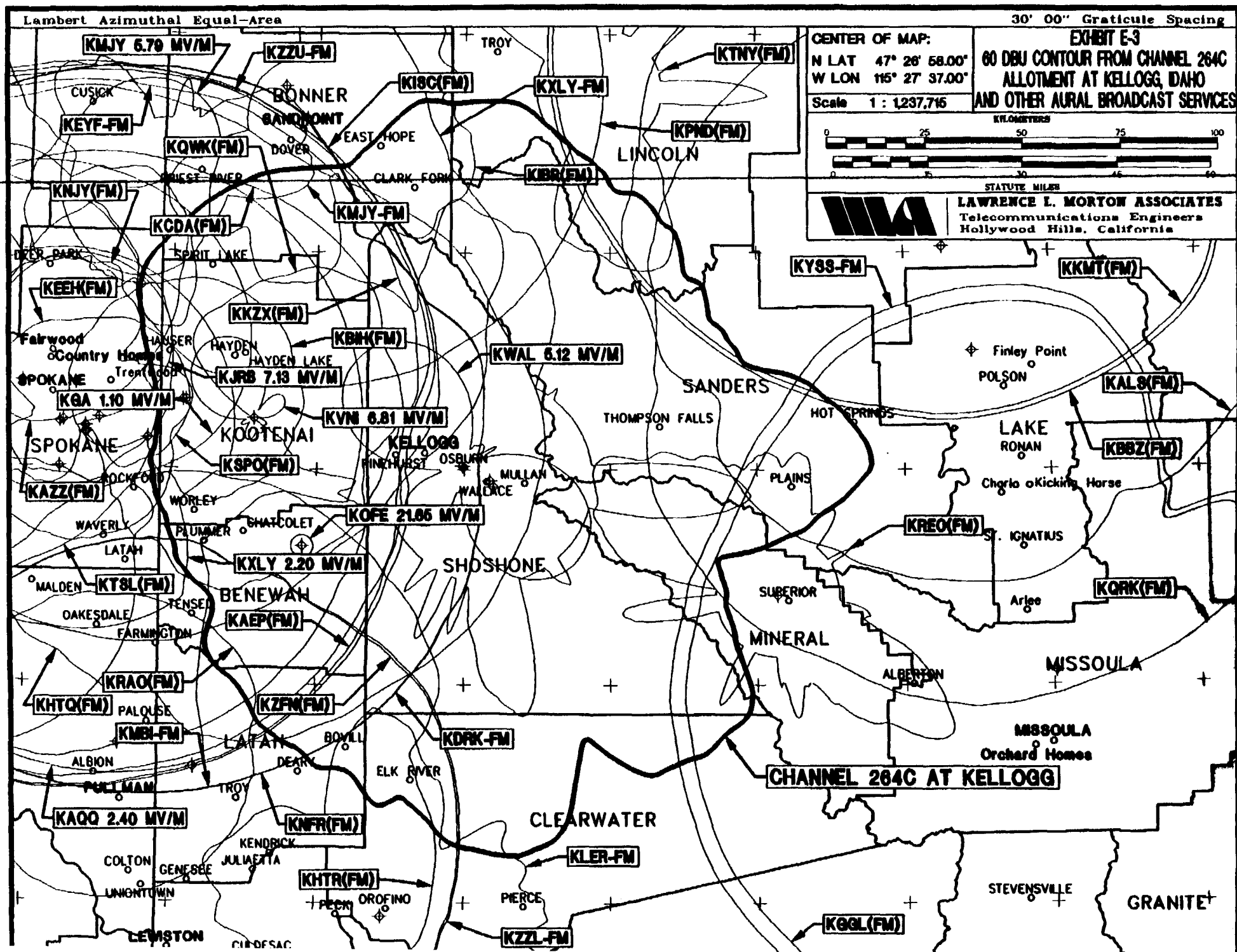


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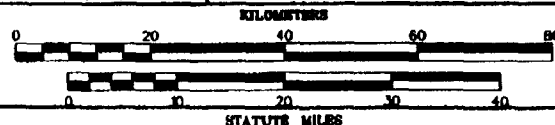


Lambert Azimuthal Equal-Area

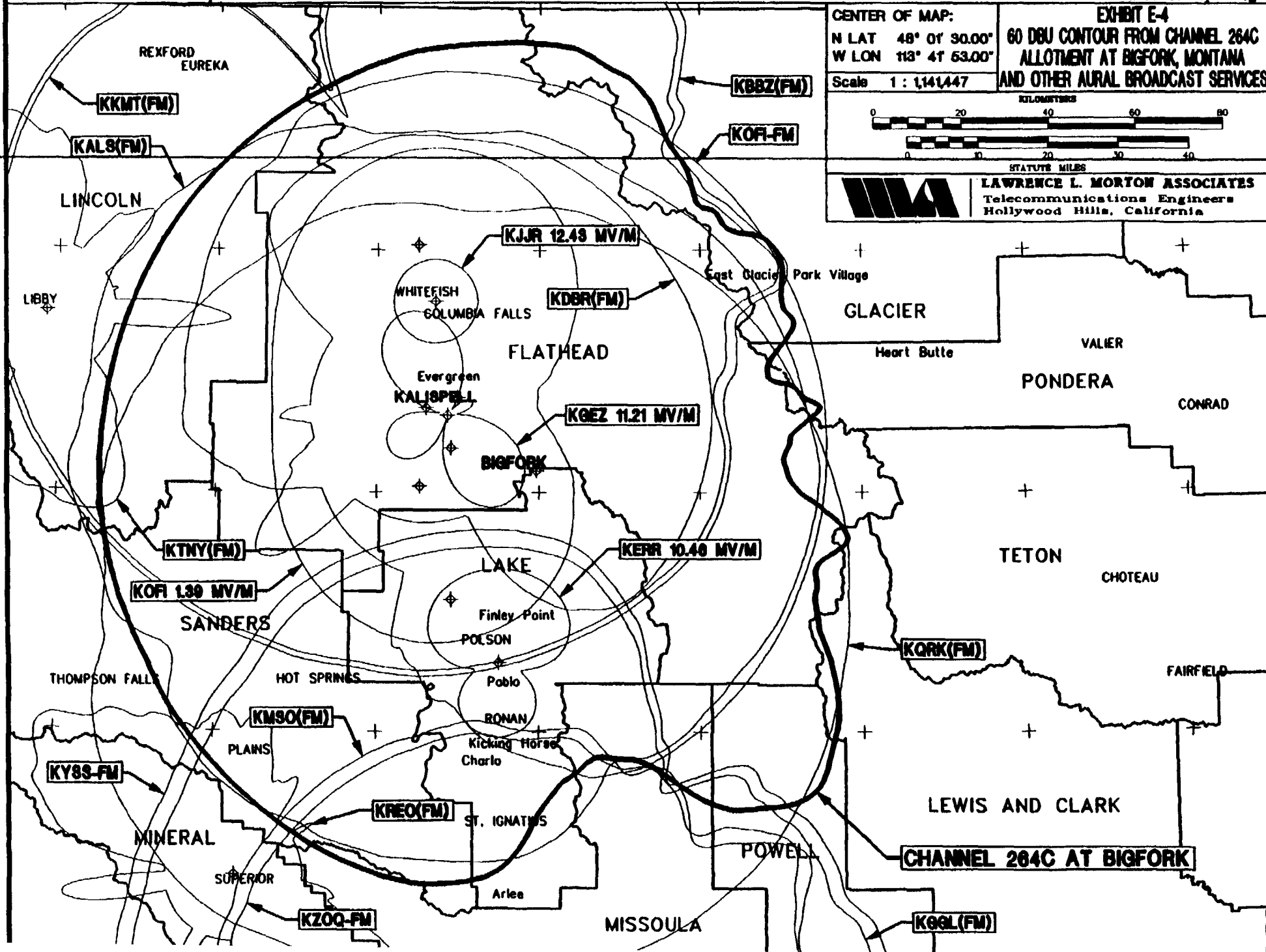
30' 00" Graticule Spacing

CENTER OF MAP:
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W LON 113° 41' 53.00"
Scale 1 : 1,141,447

EXHIBIT E-4
60 DBU CONTOUR FROM CHANNEL 264C
ALLOTMENT AT BIGFORK, MONTANA
AND OTHER AURAL BROADCAST SERVICES

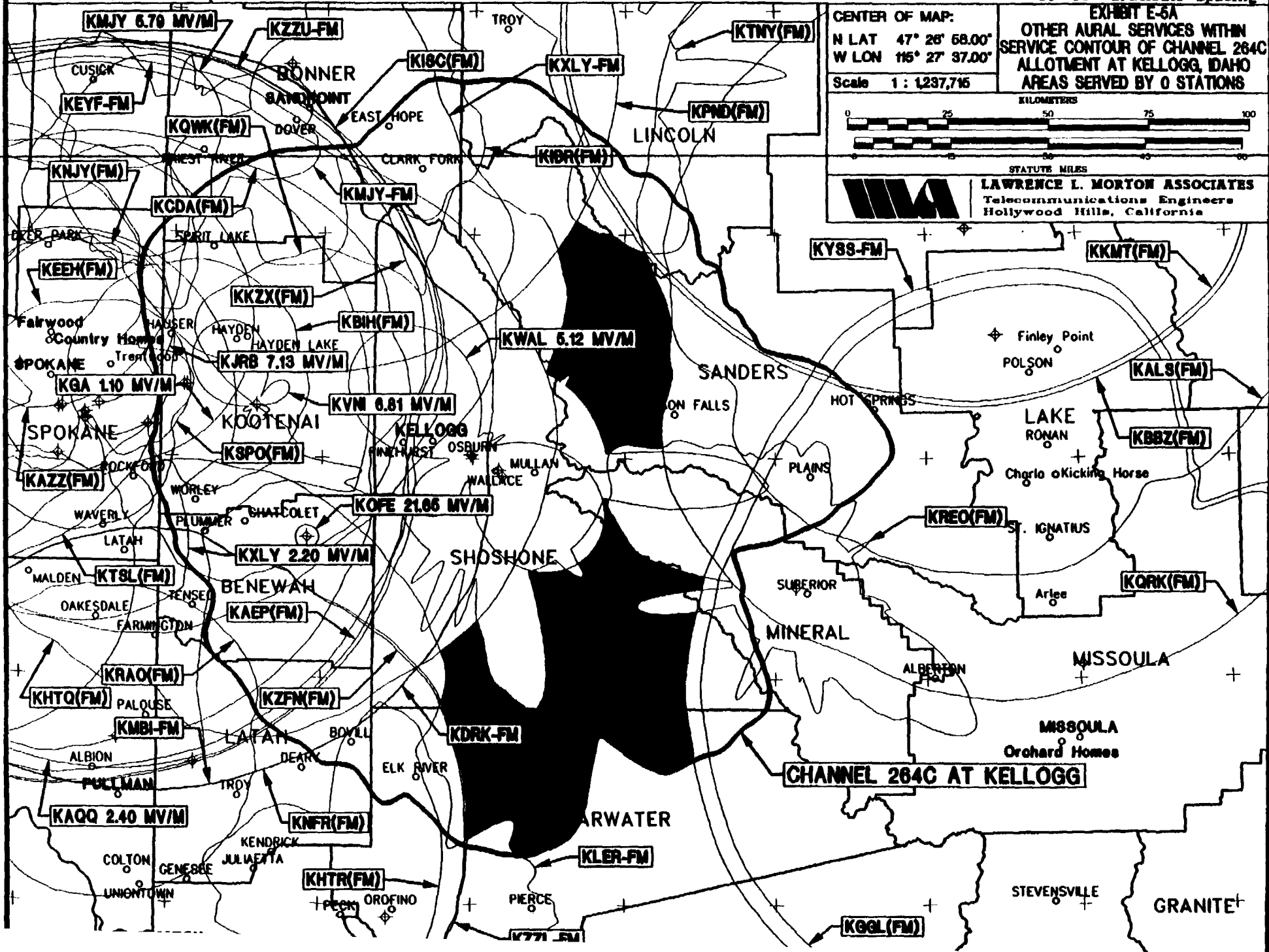


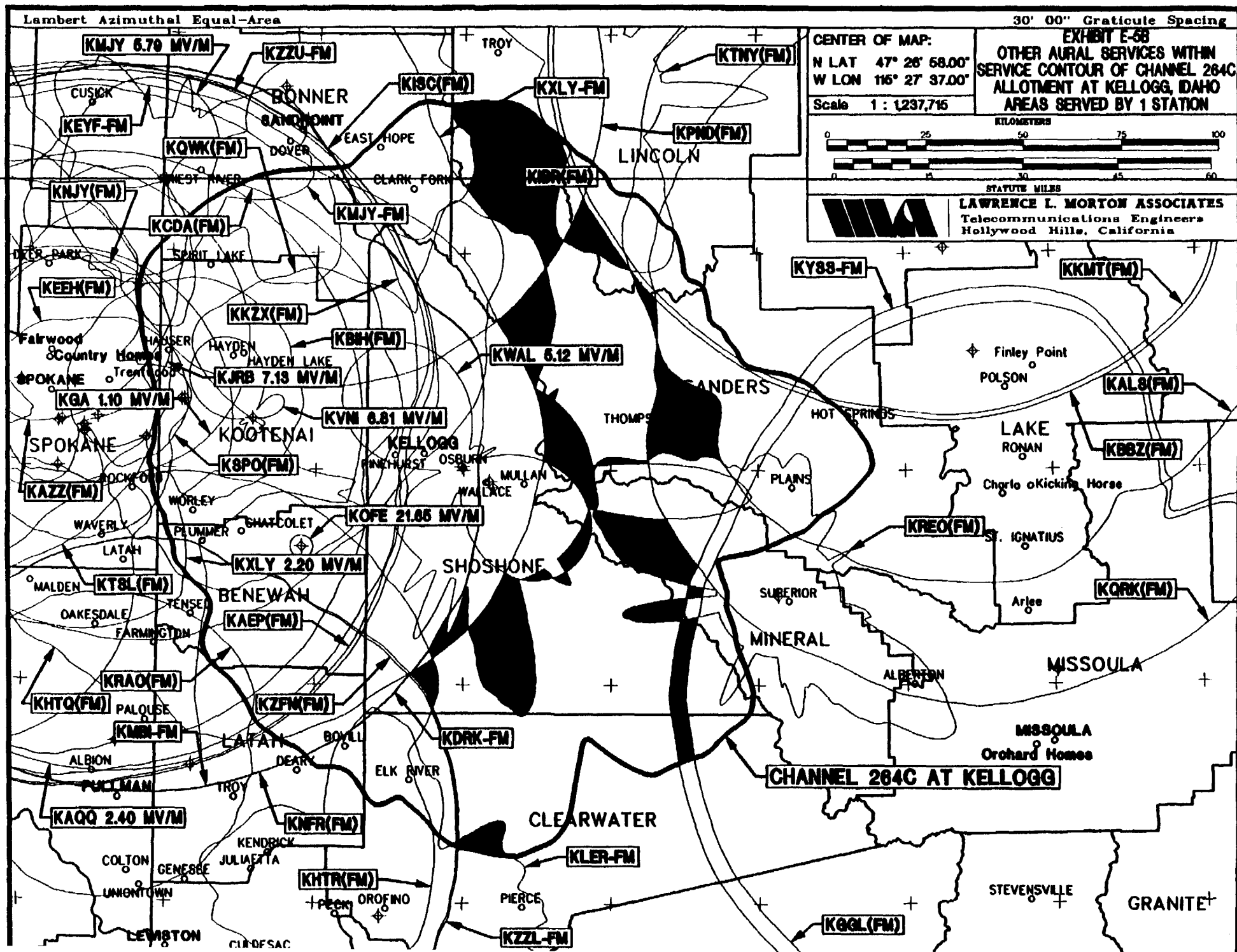
LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Hollywood Hills, California



Lambert Azimuthal Equal-Area

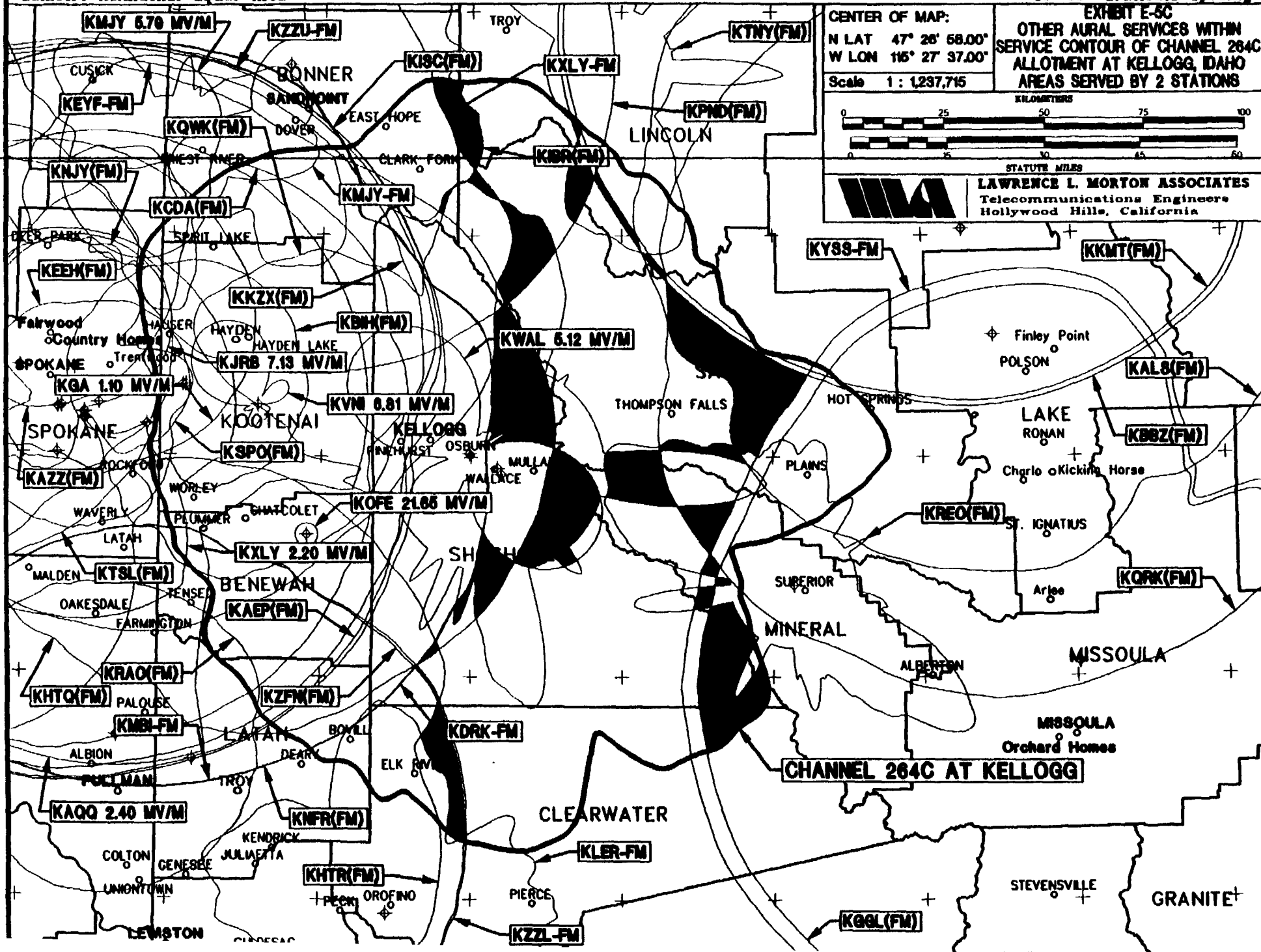
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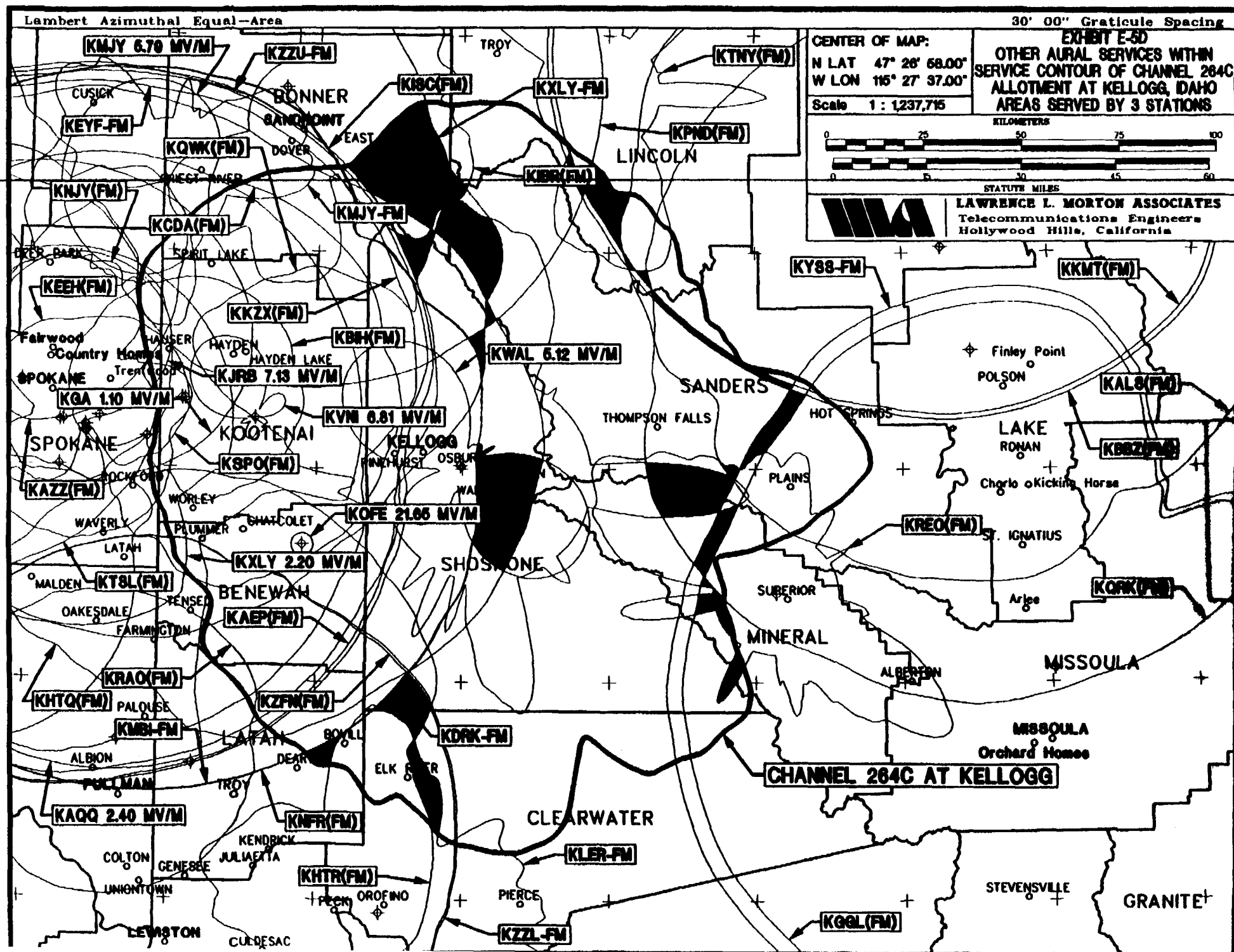


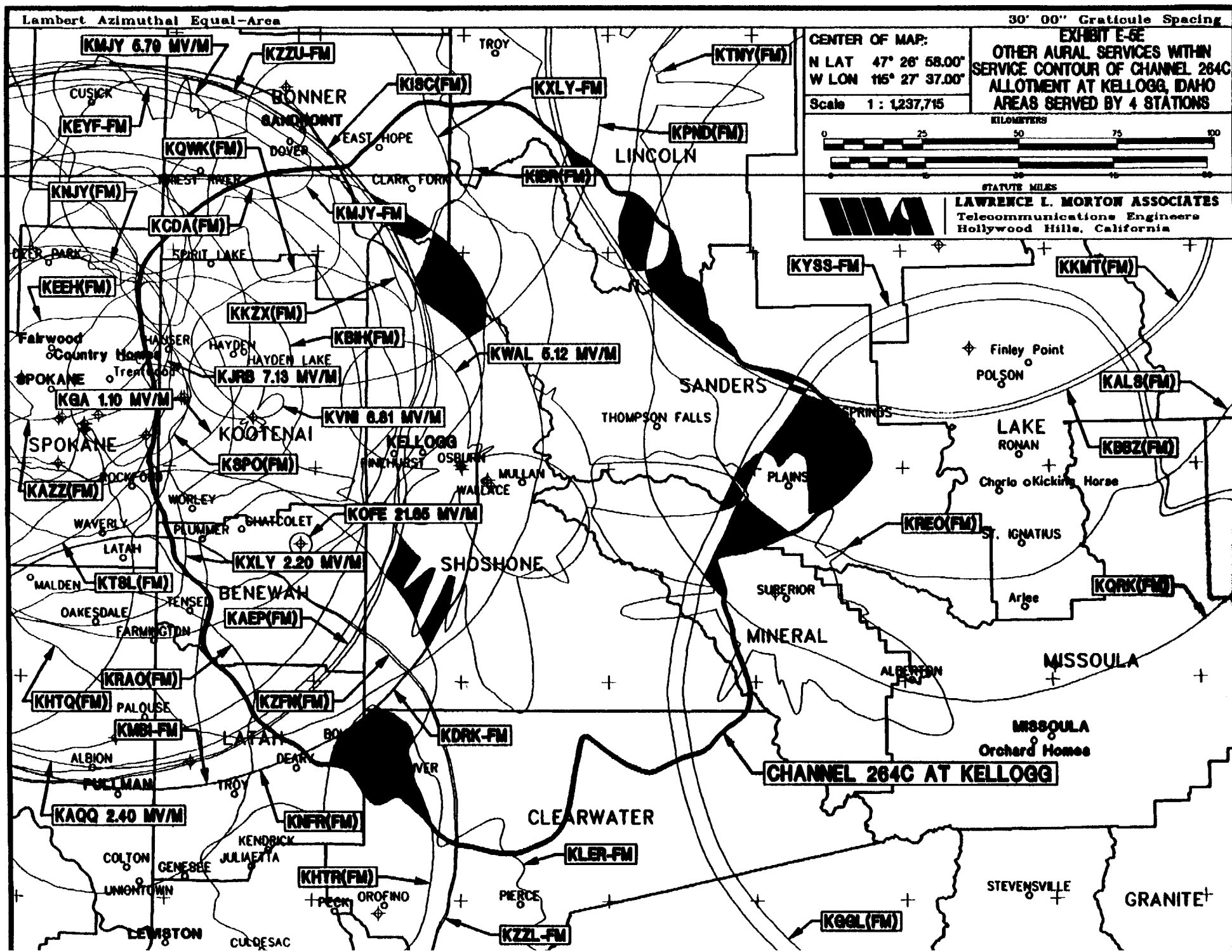


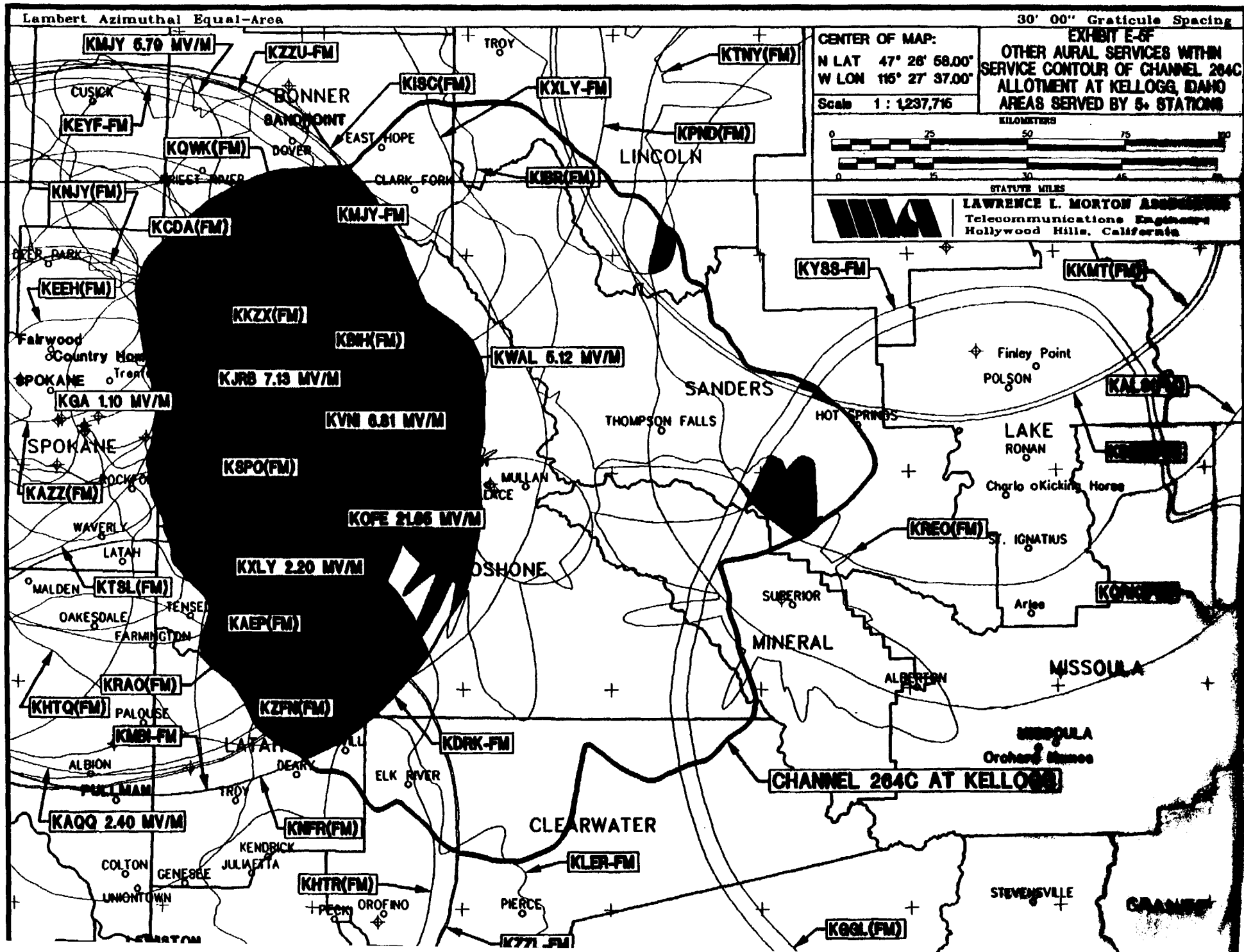
Lambert Azimuthal Equal-Area

30' 00" Graticule Spacing







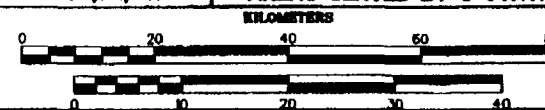


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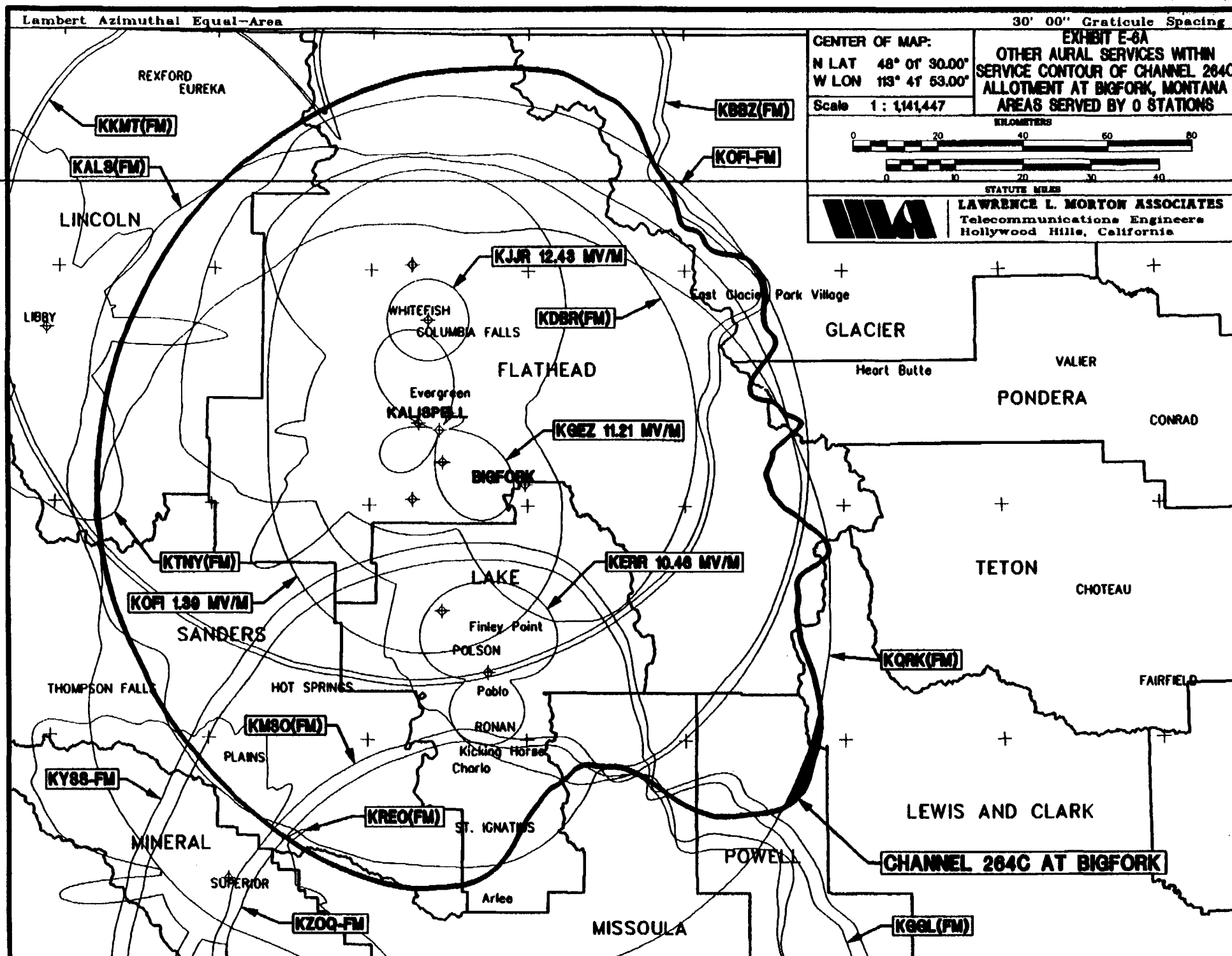
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Scale 1 : 1,141,447

EXHIBIT E-8A
OTHER AURAL SERVICES WITHIN
SERVICE CONTOUR OF CHANNEL 284C
ALLOTMENT AT BIGFORK, MONTANA
AREAS SERVED BY 0 STATIONS



LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Hollywood Hills, California



Lambert Azimuthal Equal-Area

30' 00" Graticule Spacing

CENTER OF MAP:

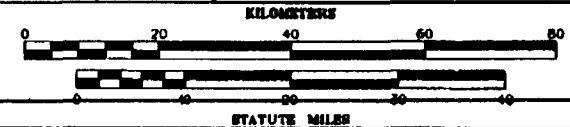
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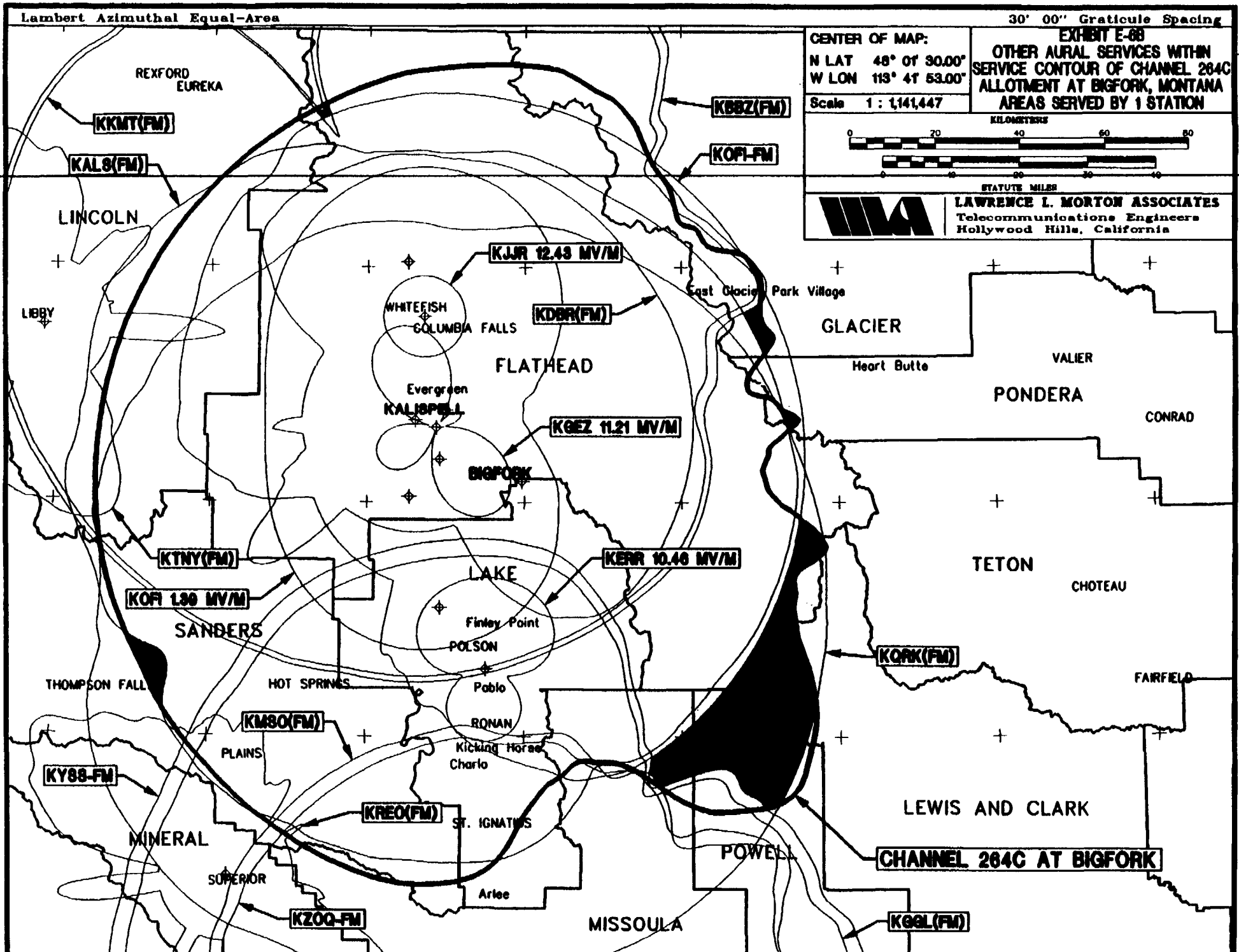
Scale 1 : 1,141,447

EXHIBIT E-88

OTHER AURAL SERVICES WITHIN
SERVICE CONTOUR OF CHANNEL 284C
ALLOTMENT AT BIGFORK, MONTANA
AREAS SERVED BY 1 STATION



LAWRENCE I. MORTON ASSOCIATES
Telecommunications Engineers
Hollywood Hills, California

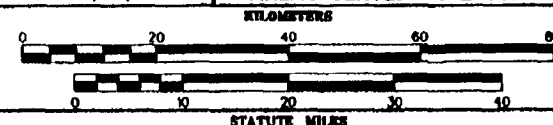


Lambert Azimuthal Equal-Area

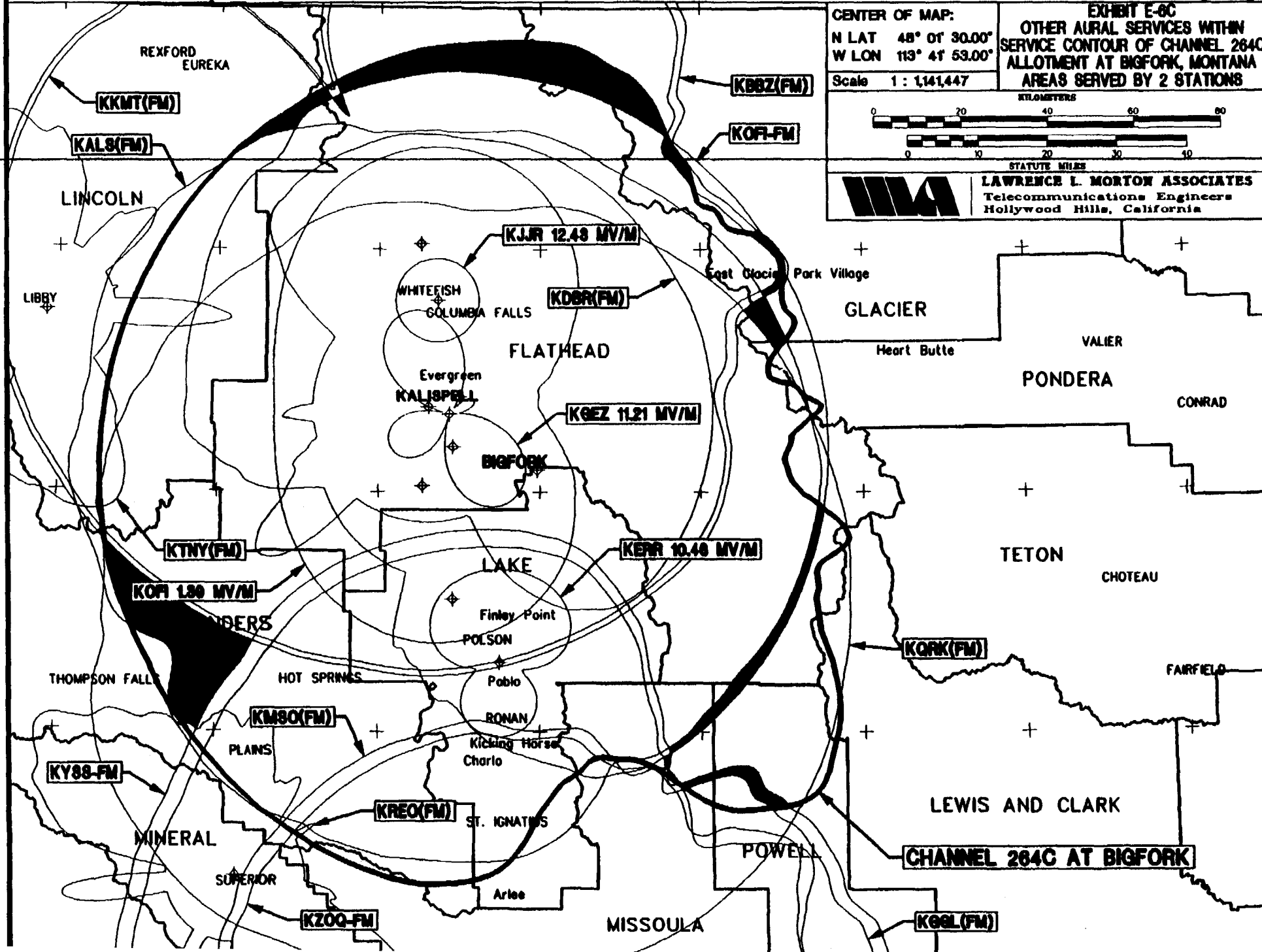
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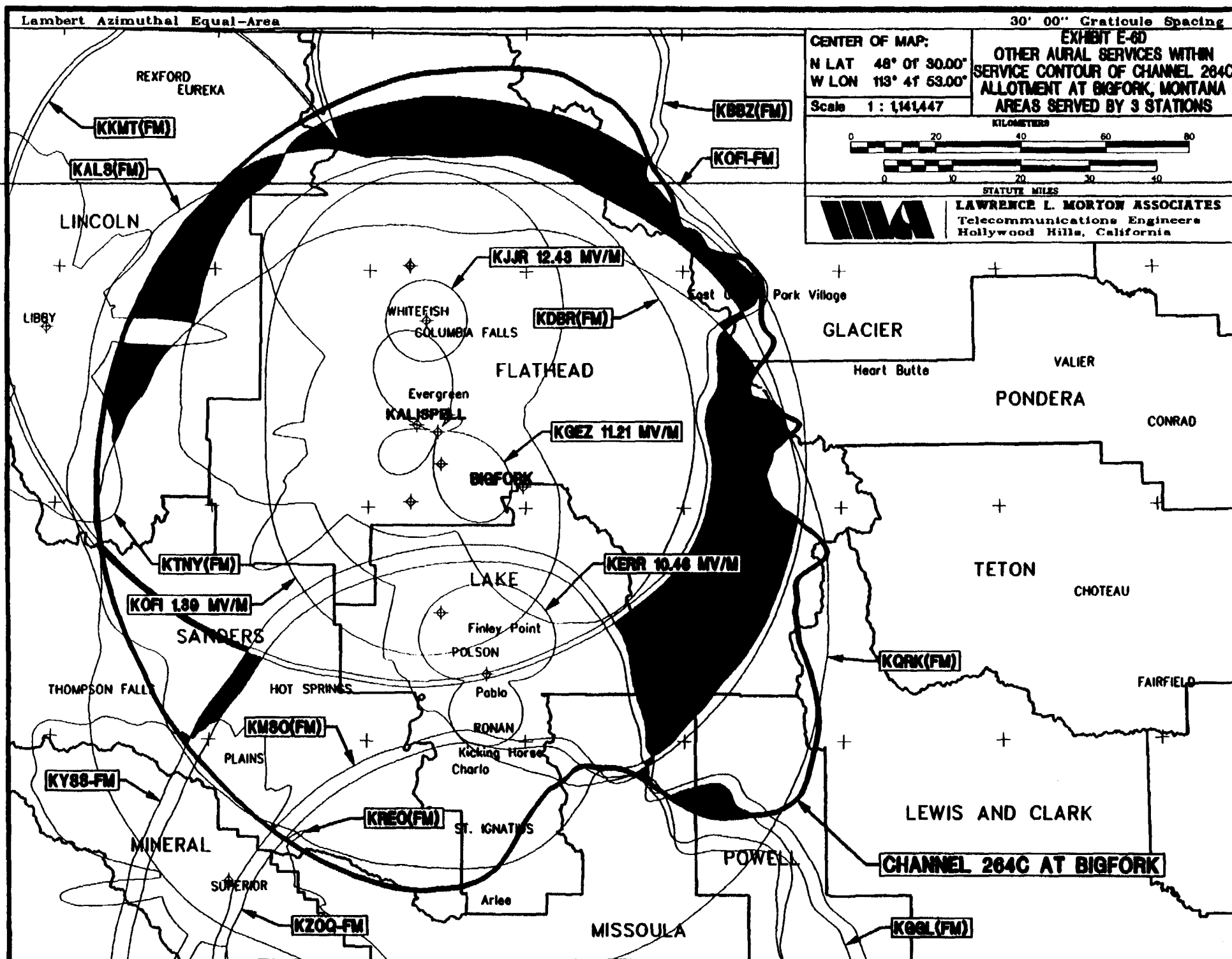
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Scale 1 : 1,141,447

EXHIBIT E-6C
OTHER AURAL SERVICES WITHIN
SERVICE CONTOUR OF CHANNEL 264C
ALLOTMENT AT BIGFORK, MONTANA
AREAS SERVED BY 2 STATIONS



LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Hollywood Hills, California





Lambert Azimuthal Equal-Area

30' 00" Graticule Spacing

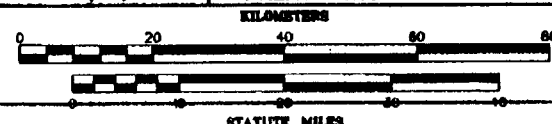
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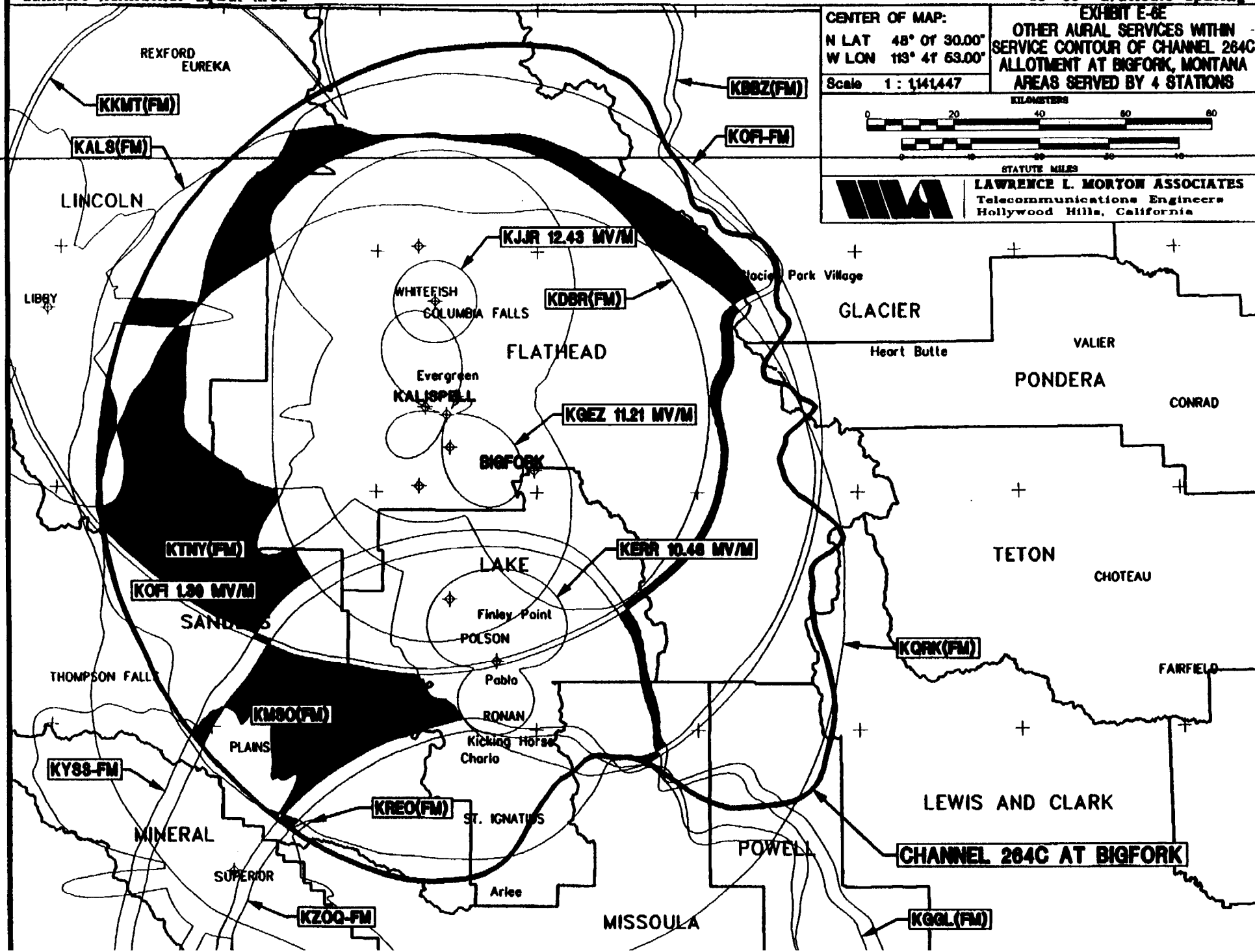
Scale 1 : 1,141,447

EXHIBIT E-6E

OTHER AURAL SERVICES WITHIN
SERVICE CONTOUR OF CHANNEL 264C
ALLOTMENT AT BIGFORK, MONTANA
AREAS SERVED BY 4 STATIONS



LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Hollywood Hills, California



Lambert Azimuthal Equal-Area

30' 00" Graticule Spacing

CENTER OF MAP:

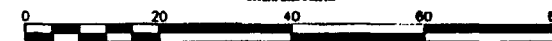
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Scale 1 : 1,141,447

EXHIBIT E-6F

OTHER AURAL SERVICES WITHIN
SERVICE CONTOUR OF CHANNEL 284C
ALLOTMENT AT BIGFORK, MONTANA
AREAS SERVED BY 5+ STATIONS

KILOMETERS



STATUTE MILES



LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Hollywood Hills, California

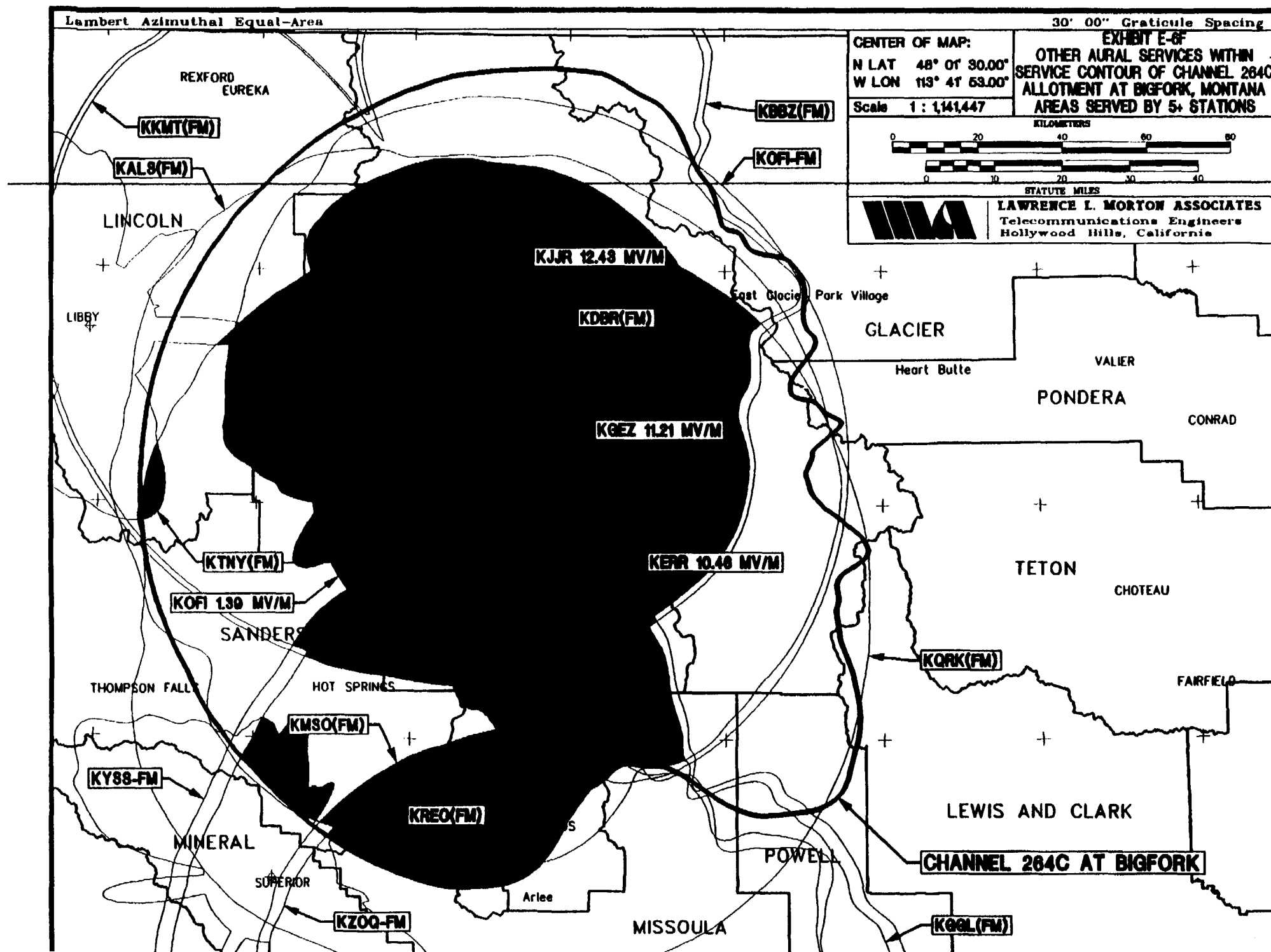


EXHIBIT E-7
OTHER AURAL BROADCAST SERVICES WITHIN
CHANNEL 264C SERVICE AREA AT KELLOGG

Bee Broadcasting, Inc.
October 1998

NUMBER OF STATIONS ALREADY SERVING THIS AREA	LAND AREA		POPULATION		
	SQUARE KILOMETERS	SQUARE MILES	TOTAL	DENSITY	
0	4,097.77	1,582.16	17.32	1,637	1.51
1	2,829.66	1,092.54	11.96	2,176	2.00
2	2,831.91	1,093.41	11.97	1,132	1.04
3	2,100.10	810.85	8.88	4,948	4.55
4	1,885.50	727.99	7.97	1,813	1.67
5	949.18	366.48	4.01	1,943	1.79
6	662.24	255.69	2.80	4,017	3.70
7	728.96	281.45	3.08	2,444	2.25
8	322.42	124.49	1.36	631	0.58
9	262.41	101.32	1.11	881	0.81
10	490.87	189.52	2.07	2,761	2.54
11	379.53	146.54	1.60	1,258	1.16
12	1,294.62	499.86	5.47	3,147	2.90
13	1,667.44	643.80	7.05	7,690	7.07
14	1,447.01	558.69	6.12	5,098	4.69
15	683.18	263.78	2.89	11,974	11.02
16	409.64	158.16	1.73	27,520	25.32
17	346.63	133.84	1.47	21,610	19.88
18	160.60	62.01	0.68	3,592	3.30
19	53.10	20.50	0.22	2,386	2.20
20	55.51	21.43	0.23	39	0.04
21	0.53	0.20	0.00	0	0.00
22	0.00	0.00	0.00	0	0.00
23	0.00	0.00	0.00	0	0.00
24	0.00	0.00	0.00	0	0.00
25+	0.00	0.00	0.00	0	0.00
TOTALS:	23,658.82	9,134.72	100.0 %	108,697	100.0 %

EXHIBIT E-8
OTHER AURAL BROADCAST SERVICES WITHIN
CHANNEL 264C SERVICE AREA AT BIGFORK

Bee Broadcasting, Inc.
October 1998

NUMBER OF STATIONS ALREADY SERVING THIS AREA	LAND AREA		POPULATION		PERCENTAGE	
	SQUARE KILOMETERS	SQUARE MILES	1990 TOTAL	PER 100 SQUARE KILOMETERS	PER 100 SQUARE MILES	PER 100 POPULATION
0	40.27	15.55	0.16	0	0.00	
1	1,085.28	419.03	4.36	10	0.01	
2	1,348.74	520.75	5.41	320	0.38	
3	3,861.09	1,490.78	15.50	287	0.34	
4	3,818.19	1,474.21	15.33	1,724	2.05	
5	3,373.60	1,302.55	13.54	2,912	3.47	
6	5,415.20	2,090.82	21.74	10,068	11.99	
7	3,909.89	1,509.62	15.69	18,809	22.40	
8	1,582.41	610.97	6.35	46,874	55.83	
9	445.50	172.01	1.79	2,947	3.51	
10	32.51	12.55	0.13	10	0.01	
11	0.00	0.00	0.00	0	0.00	
12	0.00	0.00	0.00	0	0.00	
13	0.00	0.00	0.00	0	0.00	
14	0.00	0.00	0.00	0	0.00	
15	0.00	0.00	0.00	0	0.00	
16	0.00	0.00	0.00	0	0.00	
17	0.00	0.00	0.00	0	0.00	
18	0.00	0.00	0.00	0	0.00	
19	0.00	0.00	0.00	0	0.00	
20	0.00	0.00	0.00	0	0.00	
21	0.00	0.00	0.00	0	0.00	
22	0.00	0.00	0.00	0	0.00	
23	0.00	0.00	0.00	0	0.00	
24	0.00	0.00	0.00	0	0.00	
25+	0.00	0.00	0.00	0	0.00	
TOTALS:	24,912.69	9,618.84	100.0 %	83,961	100.0 %	

EXHIBIT E-9
OTHER AURAL BROADCAST SERVICES
WITHIN CHANNEL 264C SERVICE AREA AT KELLOGG
 Bee Broadcasting, Inc.
 October 1998

NUMBER	CALL LETTERS	CITY	STATE	FREQUENCY
1	KQRK(FM)	RONAN	MT	92.3 MHz
2	KZZU-FM	SPOKANE	WA	92.9
3	KGGL(FM)	MISSOULA	MT	93.3
4	KDRK-FM	SPOKANE	WA	93.7
5	KHTQ(FM)	HAYDEN	ID	94.5
6	KYSS-FM	MISSOULA	MT	94.9
7	KLER-FM	OROFINO	ID	95.3
8	KPND(FM)	SANDPOINT	ID	95.3
9	KKMT(FM)	COLUMBIA FALLS	MT	95.9
10	KNFR(FM)	OPPORTUNITY	WA	96.1
11	KALS(FM)	KALISPELL	MT	97.1
12	KQWK(FM)	WALLACE	ID	97.5
13	KISC(FM)	SPOKANE	WA	98.1
14	KBBZ(FM)	KALISPELL	MT	98.5
15	KKZX(FM)	SPOKANE	WA	98.9
16	KZZL-FM	PULLMAN	WA	99.5
17	KXLY-FM	SPOKANE	WA	99.9
18	KEYF-FM	CHENEY	WA	101.1
19	KTNV(FM)	LIBBY	MT	101.7
20	KTSL(FM)	MEDICAL LAKE	WA	101.9
21	KBIH(FM)	COEUR D'ALENE	ID	102.3
22	KRAO(FM)	COLFAX	WA	102.5
23	KIBR(FM)	SANDPOINT	ID	102.5
24	KCDA(FM)	COEUR D'ALENE	ID	103.1
25	KNJY(FM)	SPOKANE	WA	103.9
26	KHTR(FM)	PULLMAN	WA	104.3
27	KEEH(FM)	SPOKANE	WA	104.7
28	KMJY-FM	NEWPORT	WA	104.9
29	KAEP(FM)	SPOKANE	WA	105.7
30	KZFN(FM)	MOSCOW	ID	106.1
31	KSPO(FM)	DISHMAN	WA	106.5
32	KAZZ(FM)	DEER PARK	WA	107.1
33	KREO(FM)	SUPERIOR	MT	107.5
34	KMBI-FM	SPOKANE	WA	107.9
35	KAQQ	SPOKANE	WA	590. kHz
36	KWAL	WALLACE	ID	620
37	KMJY	NEWPORT	WA	700
38	KJRB	SPOKANE	WA	790
39	KXLY	SPOKANE	WA	920
40	KVNI	COEUR D'ALENE	ID	1080
41	KOFE	ST. MARIES	ID	1240
42	KGA	SPOKANE	WA	1510

EXHIBIT E-10
OTHER AURAL BROADCAST SERVICES
WITHIN CHANNEL 264C SERVICE AREA AT BIGFORK

Bee Broadcasting, Inc.
October 1998

NUMBER	CALL LETTERS	CITY	STATE	FREQUENCY
1	KQRK(FM)	RONAN	MT	92.3 MHz
2	KGGL(FM)	MISSOULA	MT	93.3
3	KYSS-FM	MISSOULA	MT	94.9
4	KKMT(FM)	COLUMBIA FALLS	MT	95.9
5	KALS(FM)	KALISPELL	MT	97.1
6	KBBZ(FM)	KALISPELL	MT	98.5
7	KZOQ-FM	MISSOULA	MT	100.1
8	KTNY(FM)	LIBBY	MT	101.7
9	KMSO(FM)	MISSOULA	MT	102.5
10	KOFI-FM	KALISPELL	MT	103.9
11	KDBR(FM)	KALISPELL	MT	106.3
12	KREO(FM)	SUPERIOR	MT	107.5
13	KGEZ	KALISPELL	MT	600. kHz
14	KERR	POLSON	MT	750
15	KJJR	WHITEFISH	MT	880
16	KOFI	KALISPELL	MT	1180

EXHIBIT E-10
OTHER AURAL BROADCAST SERVICES
WITHIN CHANNEL 264C SERVICE AREA AT BIGFORK

Bee Broadcasting, Inc.

October 1998

NUMBER	CALL LETTERS	CITY	STATE	FREQUENCY
1	KQRK(FM)	RONAN	MT	92.3 MHz
2	KGGL(FM)	MISSOULA	MT	93.3
3	KYSS-FM	MISSOULA	MT	94.9
4	KKMT(FM)	COLUMBIA FALLS	MT	95.9
5	KALS(FM)	KALISPELL	MT	97.1
6	KBBZ(FM)	KALISPELL	MT	98.5
7	KZOQ-FM	MISSOULA	MT	100.1
8	KTNV(FM)	LIBBY	MT	101.7
9	KMSO(FM)	MISSOULA	MT	102.5
10	KOFI-FM	KALISPELL	MT	103.9
11	KDBR(FM)	KALISPELL	MT	106.3
12	KREO(FM)	SUPERIOR	MT	107.5
13	KGEZ	KALISPELL	MT	600. kHz
14	KERR	POLSON	MT	750
15	KJJR	WHITEFISH	MT	880
16	KOFI	KALISPELL	MT	1180

Kellogg Chamber of Commerce

KEILLOGG, IDAHO
608 BUNKER AVE.
83037

Phone: 208-784-0021
FAX: 208-783-4343
email:
Kellogg@nidlink.com

EPISCOPAL

Emmanuel 784-6641
1 W. Market; Kellogg

Holy Trinity 752-7031
4th & Cedar; Wallace

EVANGELICAL FREE

Grace Evangelical Free Church 753-8392
212 N. 1st; Osburn

FULL GOSPEL

Cataldo Lighthouse Ministries 682-2034
Cataldo

JEHOVAH'S WITNESSES

Kingdom Hall 556-8941
315 N. 5th; Osburn

Kingdom Hall of Jehovah 682-4532
106 S. Division; Pinhurst

LUTHERAN

American Lutheran Church - ELCA 786-7791
16 E. Riverside Ave.; Kellogg

Bethany Lutheran Church - MO Synod 752-8095
1104 Garden Ave.; Osburn

Emmanuel Lutheran Church - MO Synod 744-1324
124 Earle Ave.; Mullan

Lutheran Church - Our Savior 682-2050
15 Division Ave. S; Pinhurst

METHODIST

United Methodist Church 556-7351
213 4th; Wallace

NAZARENE

Church of the Nazarene 784-6051
631 S. Division; Kellogg

NON-DENOMINATIONAL

Christian Life Center 784-6231
308 W. Mission Ave.; Kellogg

PENTECOSTAL CHURCH OF GOD

Pentecostal Tabernacle 784-5491
306 Northview Ave.; Smelterville

SEVENTH-DAY ADVENTIST

Seventh-Day Adventist Church 556-2045
5th & Mullan; Osburn

UNITED CHURCH OF CHRIST

United Church of Christ Congregational 753-6351
408 Cedar; Wallace

Demographics and Labor Force

County Population	13,931
Kellogg	2,591
Mullan	821
Murray/Fritchard	93
Osburn	1,579
Pinehurst	1,722
Wallace	1,010
Wardner	246
Smelterville	464

Employment % by Industry	
Agriculture, Forestry, and Fisheries	2.1
Mining	24.1
Manufacturing	6.1
Construction	6.3
Transportation, Utilities, and Communication	3.5
Trade	19.8

Services and Fire	24.2
Government	13.7

Shoshone County's Largest Employers (Not ranked by size) (Includes Silver Mountain)

City of Kellogg (includes Silver Mountain)
 First Health Care
 Good Samaritan Society
 Hecla Mining
 Kellogg Joint School District
 Mullan School District
 Shoshone County Government
 Shoshone Medical Center
 Silver Valley Laboratory
 Silver Valley Resources
 Sunshine Mining
 US Forest Service
 Wallace Inn
 Wallace School District



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Shelly Hopper... 682-8890

Billie Curtis.....753-0461

Carol Dugger.....786-7037

Property Management...Joan Lilyblad



MLS



300 E Cameron
Kellogg, Idaho 83837

E Mail Address
mnrshat@rand.nidlink.com

& Grocery

4949

Pinhurst, ID

Income of \$4000 for

ment tax credit on

ity is 2.8-3.2%

Education

KELLOGG SCHOOL DISTRICT No. 391

Enrollment	
Pinchurst Elementary	303
Canyon Elementary	88
Kellogg Middle School	394
Kellogg High School	511
Total	1628
Average Class Size	22

Average expenditure per student \$3,754 (General Fund)

MULLAN SCHOOL DISTRICT No. 392

Enrollment	
John Mullan Elementary	92
Mullan High School Jr & Sr.	112
Total	204
Average Class Size	15
Average expenditure per student	\$6,889 (94/95 General Fund)

WALLACE SCHOOL DISTRICT No. 393

Enrollment	
Wallace Elementary	140
Silver Hills Middle School	203
Wallace High School	249
Silver Valley Alternative High School	37
Total	808
Average Class Size	14
Average expenditure per student	\$6,412 (94/95 all funds)

Taxes

STATE SALES TAX—5.0%
ROOM & BED TAX—2.0%

PERSONAL INCOME TAX

A graduated schedule for individual income tax is used in Idaho.

Percentages range from 2 percent to 8.2 percent on taxable income of \$4000 for joint filers and \$20,000 for single filers.

CORPORATE INCOME TAX

Flat Rate of 8% of taxable income. Idaho allows a 3% investment tax credit on qualifying depreciable property.

FOREST PRODUCTS TAX—12.5% of value of products

PROPERTY TAXES—Average urban property tax in Shoshone County is 2.8-3.2%.

Average rural property tax in Shoshone County is 1.9 - 2.4%.



SHOSHONE
INSURANCE COMPANY

Your local full service Insurance Agency

784-1175

125 McKinley Ave., Kellogg

Hico Gas & Grocery

682-4949

111 S. Division, Pinchurst, ID


Demogr

County Population



Kellogg
Mullan
Murray/Prichard

Onburg
Pinchurst
Wallace
Wardner
Smetherville

Employment % by I
Agriculture, Forestry,
and Fisheries
Mining
Manufacturing
Construction
Transportation, Utilit
and Communication
Trade



Keep
Ted Reym
Billie Curt

Health and Social Indicators

Health and Social Indicators

Persons Per Physician	940
Hospital Beds	50
Hospital Occupancy	20.1
Nursing Home Beds	177
Accidental Deaths/100,000	35.5
Teen Pregnancy/1,000	48.2
Marriage Rate/1,000	7.9
Divorce Rate/1,000	6.8
Lodging Rooms	400
Crime - Number of Offenses	1990
Murder	1
Rape	3
Robbery	3
Aggravated Assault	53
Burglary	172
Larceny	322
Motor Vehicle Theft	29
Suicide Rate per 100,000	35.9
County	19.0
State	

	1990	1993	1994	1995
Murder	1	3	1	1
Rape	3	10	2	6
Robbery	3	5	2	5
Aggravated Assault	53	35	47	49
Burglary	172	134	59	183
Larceny	322	356	147	387
Motor Vehicle Theft	29	30	14	49

Alcnglow
901 W. Park
Kellogg, ID 83837
Alpen Haus
114 McKinley Ave.
Kellogg, ID 83837...784-31

Alpine Silver
Silver Lake Mall
Coeur d'Alene

Alpine Video
124 McKinley
Kellogg, Id. 83837...784-6

American Lines
Box 3084
Spokane, Washington 99201

AYCO Financial Services
107 McKinley Ave.
Kellogg, ID 83837...784-31

Interstate 90

Interstate 90 serves as the major transportation artery in the northern United States. Traffic on I-90 has increased steadily as the Pacific Northwest becomes a major population center.

In 1984, the Idaho Department of Transportation conducted a traffic count of the vehicles traveling on I-90 passing through the Silver Valley. The average daily traffic count for the typical summer months of July and August was approximately 12,000 vehicles. The average daily count for a typical winter month such as December and January was approximately 6,500 vehicles.

Overall, the average daily traffic count for an entire year through the Silver Valley is in the neighborhood of 3 to 4 million people.

A consensus developed by officials from the IDT and the City of Kellogg was that 40 percent of the vehicles passing through the Silver Valley are commercial and local traffic and 60 percent of the traffic is tourists and cross-country travelers. The average monthly figures for winter and summer would support these estimates.

The number of vehicles traveling through the Silver Valley continues to grow each year. I-90 has experienced an average annual increase of 5 percent to 10 percent in traffic counts for the past 10 years. And the count is expected to exceed 4 million vehicles.

The average vehicle carrying a family on vacation has 2.7 occupants, according to statistics. If 60 percent of all the vehicles are carrying tourists or cross-country travelers, then 6,750 tourists will be passing through the Silver Valley this year.

Silver Hills Apartments

Low Income Subsidized

752-7181

Chris Christopherson Inc.

Assayers and Consultants

1020 McKinley Ave., P.O. Box 302

784-31

Upstream M

(208) 7

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Kellogg, Idaho 83837
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Live Bait


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1-800-435-2588


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AND SUPPLIES
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Kellogg, ID

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- Beer & Wine -
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Summer Hours 6 AM - 9 PM

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DEPARTMENT OF
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Aveo Financial Services
Bank of America
Beale House Bed & Breakfast
Bitterroot Mercantile
Blue Anchor Trailer Park
Brainard, Wendell
Broken Wheel Restaurant
Buder, Lynn
Bumble Bee Nursery
Buntion Studios
Buy Idaho
Calkins, Kay
Cassidy, Dr. Bruce
Chapman, Ray
Columbia Paints & Coatings
Country Chef
Credit Bureau
of Shoshone County
Crown Electric
Crystal Gold Mine Tour
Dave Smith Motors
Dick Doty & Associates
Dirty Ernie's Saloon
Down by the Depot R.V. Park
Environmental Reclamation
of Idaho, Ltd., Co.
Evans & Keane Atty.
Excelsior Cycle and Sport
Factory Outlets
Family Home Mortgage
First Allied Securities
First American Title of
Shoshone County
First Security Bank
Furniture Exchange and
Trustworthy Hardware
General Telephone
H.F. Magnuson and Co.
Hidden Creek Ranch

Hoffman's Shoe Box
Horvath, Louis
Humdinger Drive In
Hydrametrics, Inc.
Idaho Department of
Health and Welfare
Idaho Department
of Labor
Idaho Silver by JC
Insulspan/Idaho, Inc.
J.C. Penney
Jack's Hook Shop
Joint School District 391
Kellogg Animal Hospital
Kellogg Bowling Alley
Kellogg Inn
Kellogg Insurance
Kellogg Lumber Co.
and R.V. Center
Kellogg Medical Clinic
Kellogg Plastics Ltd.
Kellogg Senior Center
Kellogg Super Shop
Kellogg Vacation Homes
Kellogg Vision Center
Ken Ives TV Sales
Kerner, Enid
Kingsdon 3 Ranch B&B
Koerner Furniture
Larry's Saw Shop
Lee Schwab Tires
Lifetime Roofing and Siding
Lockout Ski Shop
Management Company, The
Maple House, The
Master's Insurance
McDonald's
McLuer Burger
Miner's Hat Realty
Moggy Dist. Inc.
Mary Lou Kirby & Associates
Mountain Valley Care &
Rehabilitation Center
Mountain View Cabins

N.I.C.E. Transportation
New Bunker Hill Mining Co., The
Norman, Dr. Neil
Old Mission State Park
Painhandle Distributing
Painhandle Linen Supply
Pamdy, Fran
Parrott Mechanical, Inc.
Peacock, Mike
Pinchurst Golf Course, Inc.
Pinchurst Medical Clinic
Pischner, Don
Portland House, The
Progressive Printing
Rainbow Dental Clinic
Reed's Party Shop
Reflections 2000
Riggs, Jack
River Odyssey West, Inc.
Rock Bottom Gulch, Inc.
Rock Oil Co.
Sani's Restaurant
Scott Dege & Company
Scott, Sandy
Seale, Ann
Shapiro, Dr. Stanley
Sheppard, Nina
Shoshone Glass
Shoshone Golf & Tennis Club
Shoshone Insurance
Shoshone Medical Center
Shoshone Mining and
Smelting Museum
Shoshone News Press
Sierra Silver Mine Tour
Silver Edge Ski Shop
Silver Heritage Realty
Silver Mountain
Silver Needle Inn
Silver Needle Textiles
Silver Valley Appliance
Silver Valley Baking
Silver Valley Computer Service
Silver Valley KOA

Silver Valley Recognition
& Awards
Silver Valley Rentals
Silver Valley Tire
Silver Valley Voice
Silverborn Motor Inn and
Silver Spoon Restaurant
Silvertip Supply, Inc.
Sixth Street Motel/Truax
Spokesman Review-Chronicle
Starr Creative
State Farm Insurance -
Doug Zelger
Stein's Hallmark/Toyland
Stein's I.G.A. Kellogg-Oxburn
Sterling Realty
Stovren Supply
Sulway
Summerville Drug
Sunshine Mining Company
Sunshine Restaurant, Lounge
& Motel
Super & Motel
TeleSystems Inc.
Tomlinson Black Realty
Trail Motel
Twinn City Furniture
U.S.D.A. Forest Service
United Church of Kellogg
Valley Investment
Property Management
Vinnie's Body Shop, Inc.
Wah Hing Restaurant
Ward, Danny
Washington Water Power
Wason, Larry
US Bank
West Valley Realty
WestStar Communications
Wick's Bar and Grill
Young, Carol
Zanetti Brothers